

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARK OWEN and JAMES WANDLING,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ELASTOS FOUNDATION, FENG HAN, and
RONG CHEN,

Defendants.

Case No. 1:19-cv-5462-GHW

ORAL ARGUMENT
REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Deny Class Certification, dated October 11, 2022, together with the Declaration of Carl P. Hudson, defendants Elastos Foundation, Feng Han, and Rong Chen will move this Court, before the Honorable Gregory Woods, at Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, Room 2260, New York, New York, 10007, on a date and time to be determined by the Court, for an Order, under Fed. R. Civ. P. 23, denying class certification and granting such other relief as the Court deems just and proper.

Dated: San Francisco, California
October 11, 2022

/s/ Kenneth P. Herzinger
Kenneth P. Herzinger
Carl P. Hudson (*Pro Hac Vice*)
Erin Zatlin (*Pro Hac Vice*)
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